

quinn emanuel trial lawyers | los angeles

865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL (213) 443-3000 FAX (213) 443-3100

October 23, 2019

VIA ECF

Hon. Nathanael Cousins
United States Magistrate Judge
280 South First Street
San Jose, California 95113

Re: *In re Ex Parte Application of Broadcom Corporation and Avago Technology*; Case No.
5:19-mc-80133-NC – Joint Status Report

Dear Judge Cousins:

Pursuant to the Court's Minute Order on October 3, 2019 (Dkt. No. 29) ("Minute Order"), Broadcom Corp. and Avago Technologies Int'l Sales Pte. Ltd (together, "Applicants") and Respondent NVIDIA Corporation ("NVIDIA") provide the following joint status report.

By October 16, 2019, NVIDIA produced certain Tegra X1 documents and provided an email explanation about its search for Riva TNT documents. Applicants have reviewed those materials and made certain inquiries to NVIDIA about the materials produced, including in regard to the completeness of the production in view of the scope of materials NVIDIA agreed to provide, as well as whether NVIDIA will produce a witness to testify about the matters specified in the deposition subpoena. The parties expect to continue to meet and confer in advance of the hearing presently set for October 30, 2019, and will advise the Court at or before the hearing if they are able or unable to resolve any remaining differences.

DATED: October 23, 2019

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Yury Kapgan

Yury Kapgan (Bar No. 218366)
yurykapgan@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Attorneys NVIDIA CORP.

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY | CHICAGO | WASHINGTON, DC | HOUSTON | SEATTLE | BOSTON | SALT LAKE CITY
LONDON | TOKYO | MANNHEIM | HAMBURG | PARIS | MUNICH | SYDNEY | HONG KONG | BRUSSELS | ZURICH | SHANGHAI | PERTH | STUTTGART

DATED: October 23, 2019

HOPKINS & CARLEY
A Law Corporation

By: /s/ Jason S. Angell

Jason S. Angell (Bar No. 221607)
chohn@hopkinscarley.com
70 South First Street
San Jose, CA 95113
Telephone: (408) 286-9800
Facsimile: (408) 998-4790

Attorneys for BROADCOM CORP. and AVAGO
TECHS. INT'L SALES PTE. LTD.

ATTESTATION OF E-FILED SIGNATURE

I, Yury Kapgan, am the ECF User whose ID and password are being used to file this Stipulation. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Jason S. Angell has concurred in this filing.

DATED: October 23, 2019

By /s/ Yury Kapgan
Yury Kapgan